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23 **UNITED STATES DISTRICT COURT**  
24 **CENTRAL DISTRICT OF CALIFORNIA**  
25 **WESTERN DIVISION**

26 **MINDS, INC., TIM POOL, THE**  
27 **BABYLON BEE LLC, and**  
28 **NATIONAL RELIGIOUS**  
1 MINDS, INC., TIM POOL, THE  
2 BABYLON BEE LLC, and  
3 NATIONAL RELIGIOUS  
4 BROADCASTERS,

5 **Plaintiffs,**

6 **v.**

7 **ROBERT A. BONTA, Attorney**  
8 **General of California, in his official**  
9 **capacity,**

10 **Defendant.**

11 Case No.: 2:23-cv-02705-RGK-MAA

12 **PLAINTIFFS' SUPPLEMENTAL**  
13 **STATEMENT RE MOTION TO**  
14 **DISMISS AND PARTICULAR**  
15 **COMPLAINT ALLEGATIONS**

16 Date: June 26, 2023

17 Time: 9:00 am

18 Courtroom: Roybal 850

1 Plaintiffs file this supplemental statement to bring to the Court's attention newly  
2 discovered facts relevant to defendant's pending motion to dismiss (Dkt 23).

3 Plaintiffs' amended complaint alleges that "NRB member Salem Media Group Inc.  
4 ('Salem Media') owns GodTube.com and TeacherTube.com, both of which allow users  
5 to create public profiles, subscribe to other user's channels (thereby populating a list of  
6 other users with whom the user connects), and post video content." (Dkt 20 ¶ 16.) On  
7 June 15, 2023, Plaintiffs discovered that while this was true at one time, Salem Media has  
8 since disabled some of these functions, and does not intend to reenable them, for reasons  
9 other than the challenged statute. Accordingly, Plaintiffs no longer allege that Salem  
10 Media is subject to the requirements of AB 587. (*See id.* ¶¶ 107, 121.) Plaintiffs maintain  
11 the other allegations in the amended complaint, including that Salem has been accused of  
12 spreading misinformation. (*Id.* ¶ 102.)

13  
14  
15 Dated: June 16, 2023

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16  
17 By: /s/ James R. Lawrence  
18 James R. Lawrence, III

19 Attorneys for Plaintiffs Minds, Inc.,  
20 Tim Pool, The Babylon Bee LLC, and  
National Religious Broadcasters